



ANDREW O. ISAR

4423 POINT FOSDICK DRIVE, NW  
SUITE 306  
GIG HARBOR, WA 98335  
TELEPHONE: 253.851.6700  
FACSIMILE: 866.474.3630  
WWW.MILLERISAR.COM

Via Overnight Delivery

June 17, 2015

Ms. Sara Clark  
Department Secretary  
Administrative Unit  
Massachusetts Department of Telecommunications and Cable  
1000 Washington Street, Ste. 820  
Boston, MA 02118-6500

RE: TNCI Operating Company LLC, Tariff Advice Letter No. 3

Dear Ms. Clark:

TNCI Operating Company LLC submits to the Massachusetts Department of Telecommunications and Cable an original, one three-hole punched, and three (3) copies of amended Sheet Nos. 2 and 42, and original Sheet No. 43 to TNCI Operating Company LLC's ("TNCI OpCo") Massachusetts switched access tariff, Massachusetts M.D.T.C. Tariff No. 3, for incorporation into the Company's Tariff. A \$100.00 tariff filing fee is also enclosed.

This submission is made pursuant to the Federal Communications Commission's ("FCC") *Report and Order and Further Notice of Proposed Rulemaking*, in Docket Nos. WC Docket No. 10-90, et al., FCC 11-161,<sup>1</sup> *Second Order on Reconsideration* in Docket Nos. WC Docket No. 10-90, et al., FCC 12-47,<sup>2</sup> Sections 51.911 and 61.26(c)<sup>3</sup> of the FCC's rules, 47 C.F.R. §§51.911, 61.26(c), and the Department's May 1, 2015 *Notice*.<sup>4</sup>

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<sup>1</sup> *Connect America Fund et al.*, WC Dkt. No. 10-90 et al., *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*), *pets. for review pending*, *Direct Commc'ns Cedar Valley, LLC v. FCC*, No. 11-9581 (10th Cir. filed Dec. 8, 2011) (and consolidated cases).

<sup>2</sup> *Id.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 12-47 (rel. April 25, 2014)

<sup>3</sup> Pursuant to Section 61.26(c), "The benchmark rate for a CLEC's switched exchange access services will be the rate charged for similar services by the competing ILEC. If an ILEC to which a CLEC benchmarks its rates, pursuant to this section, lowers the rate to which a CLEC benchmarks, the CLEC must revise its rates to the lower level **within 15 days of the effective date of the lowered ILEC rate.**" [Emphasis supplied].

<sup>4</sup> 2015 Intrastate Intercarrier Compensation Rate Reduction Tariff Filings; Related ILEC Certifications and Data Submittals (May 1, 2015).

Ms. Sara Clark  
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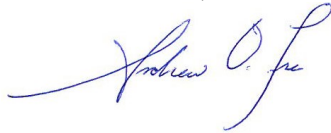
On June 16, 2015, The Verizon Telephone Companies ("Verizon") amended Section 31 of its Tariff F.C.C. No. 11, *inter alia* reducing the Composite Terminating End Office Charge. TNCI OpCo complies with the above cited orders and rules by reducing its terminating intrastate access rate and intrastate Toll VoIP-PSTN traffic rates through adoption of the corresponding Verizon Telephone Companies' amended terminating access rates set forth in The Verizon Telephone Companies' Tariff F.C.C. No. 11, effective July 1, 2015. The Company's F.C.C Tariff No. 1 may be viewed at <https://apps.fcc.gov/etfs/public/lecTariffs.action?idLec=611>. A copy of the applicable rate page contained in the Company's F.C.C. Tariff No. 1 is also attached.

A July 1, 2015 effective date is requested to enable the Company to comply with the above cited orders and rule.

Please acknowledge receipt of this filing by file-stamping the additional copy of this letter and returning it in the self-addressed stamped envelope provided for this purpose. Thank you for your attention to this matter. Questions may be directed to the undersigned..

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to  
TNCI Operating Company LLC

cc: Ms. Sara Clark (separate electronic copy via email to [dte.filing@state.ma.us](mailto:dte.filing@state.ma.us))

Enclosure

**CHECK SHEET**

The sheets of this Tariff are effective as of the date shown. The Sheet revisions appearing below designate amendments from the original Tariff Sheet and are in effect on the date shown at the bottom of this Sheet. An asterisk appearing next to the revision indicates Sheets submitted with an amended filing.

<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>
1	Original	30	Original				
2	Second*	31	Original				
3	Original	32	Original				
4	Original	33	Original				
5	Original	34	Original				
6	Original	35	Original				
7	Original	36	Original				
8	Original	37	Original				
9	Original	38	Original				
10	Original	39	Original				
11	Original	40	Original				
12	Original	41	Original				
13	Original	42	Second*				
14	Original	43	Original*				
15	Original						
16	Original						
17	Original						
18	Original						
19	Original						
20	Original						
21	Original						
22	Original						
23	Original						
24	Original						
25	Original						
26	Original						
27	Original						
28	Original						
29	Original						

Issued: June 18, 2015

Effective: July 1, 2015

Issued by:

Laura Thomas  
President/CEO  
114 E. Haley Street, Suite A  
Santa Barbara, CA 93101

**RATES****4.1 ACCESS SERVICES****4.1.1 Switched Exchange Direct Access**

Originating, per access minute	\$0.003722
Terminating, per access minute	\$0.003722

**4.1.2. Switched Exchange Tandem Access**

Originating, per access minute	\$0.005250
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Terminating, per access minute		
Tandem transport, fixed	\$0.00	(T)
Tandem transport, per mile (1 mile)	\$0.000002	
Tandem switching	\$0.001574	
Composite terminating end office charge	\$0.002406	(T)(R)

**4.1.3 Toll Free Database Access Service**

Customer Identification Charge		
Per Query	\$0.004186	
800 to POTS Number Translation		
Per Query	\$0.000000	(M)*

(M)

\*Material moved to Sheet No. 43.

Issued: June 18, 2015

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President/CEO  
114 E. Haley Street, Suite A  
Santa Barbara, CA 93101

**RATES, Continued****4.2 MISCELLANEOUS SERVICES**

(M)\*

**4.2.1 Presubscription**

Authorized PIC Change  
Per Telephone Exchange Service Line or Trunk, manual only \$5.00

**4.3 INDIVIDUAL CASE BASIS ARRANGEMENTS**

Individual Case Basis ("ICB") arrangements will be developed on a case-by-case basis in response to a bona fide Customer or prospective Customer request and based on specific Customer commitments, unless otherwise prohibited by law or regulation. ICB arrangement switched exchange access service rates will be available to any similarly situated Customer.

**4.4 VoIP-PSTN TRAFFIC**

Originating, per access minute \$0.003722

Terminating, per access minute

Tandem transport, fixed	\$0.00	(T)
Tandem transport, per mile (1 mile)	\$0.000002	
Tandem switching	\$0.001574	(R)
Composite terminating end office charge	\$0.002406	(T)

(M)

**RATES**, Continued**4.1 ACCESS SERVICES**, Continued

## 4.1.1 Switched Access, Continued

**District of Columbia, Delaware, Maryland, New Jersey, Pennsylvania, Virginia**

Verizon Telephone Companies Tariff FCC No. 1 Section 6

**Connecticut, Massachusetts, Rhode Island, New York**

The Verizon Telephone Companies Tariff F.C.C. No. 11 Section 31

**California**

Pacific Bell Telephone Company Tariff F.C.C. No. 1, Section 6

**Nevada**

Nevada Bell Tariff F.C.C. No. 1, Section 6

**West Virginia**

Frontier Telephone Companies Tariff F.C.C. No. 4 Section 6

**Maine, New Hampshire, Vermont**

The Fairpoint Telephone Companies Tariff F.C.C. No. 1 Section 31

## 4.1.2 Toll Free Database Access Service

The Toll Free Database Access Service, will apply for each Toll-Free 8XX call query received at the Company's (or its provider's) 8XX data base.

Per query

\$0.0054